

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HERMAN WILLIAMS,)	
)	Case No.: 23-CV-5945
Plaintiff,)	
)	Hon. Sunil R. Harjani
v.)	Hon. Daniel P. McLaughlin
)	
LUCIAN TESSMANN, et al.)	
)	
Defendants.)	JURY TRIAL DEMANDED

**DEFENDANTS’ *UNOPPOSED* MOTION FOR ADDITIONAL
TIME TO RESPOND TO PLAINTIFF’S MOTION TO QUASH SECOND SUBPOENA
TO ILLINOIS DEPARTMENT OF CORRECTIONS FOR JAIL PHONE CALLS**

Defendants Lake County, Charles Fagan, Dennis Pensala, Kevin Berrill as Special Representative for Defendant Robert Randall (Deceased), Leonard Brezinski, Daniel Colin, Village of Vernon Hills, and Richard Davies, (collectively, “Moving Defendants”), by and through their attorneys, The Sotos Law Firm, P.C., move this Court for an extension of time up to and including May 19, 2025, to respond to Plaintiff’s Motion to Quash Second Subpoena to Illinois Department of Corrections for Jail Phone Calls and in support of, state as follows:

1. On May 5, 2025, Plaintiff filed his Motion to Quash Second Subpoena to Illinois Department of Corrections for Jail Calls. (Dkt. 225.)
2. The Court directed Moving Defendants to file their response by May 16. (Dkt. 226.)
3. Moving Defendants now seek a three-day extension of time—until May 19—to respond to Plaintiff’s motion.
4. This motion is not brought for purposes of delay and good cause exists to grant the requested extension due to Defense Counsel’s current professional obligations and

scheduling conflict. Specifically, the undersigned has a motions *in limine* due to be filed before Judge Ellis in *Johnson v. Guevara, et al.*, 20-CV-04156 on May 16, 2025, for which a final pretrial order is due June 6, 2025.

5. On May 16, 2025, counsel for Moving Defendants contacted Plaintiff's counsel, John Marrese, regarding the relief sought herein, at which time, Mr. Marrese indicated he had no objection to the requested extension.

WHEREFORE, in light of the foregoing, Moving Defendants respectfully request until May 19, 2025, to file their response to Plaintiff's motion.

Dated: May 16, 2025

Respectfully submitted,

/s/ Josh M. Engquist

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One of the Attorneys for Moving Defendants

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that on **Friday, May 16, 2025**, I electronically filed the foregoing **Defendants' Unopposed Motion for Additional Time to Respond to Plaintiff's Motion to Quash Second Subpoena to Illinois Department of Corrections for Jail Phone Calls** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants listed on the below Service List:

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